In the matter of RM-11287

Establishment of a Low Power AM broadcast service

These are the comments of

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I am a retired Broadcast engineer, hold a general radiotelephone operators license (Formerly 1st Class license) and hold Extra class Amateur license W4KNX. I formerly held a minority share ownership of a Class IV (now C) AM station. I feel I am qualified to comment on this issue.

I feel the commission should establish a new LPAM service.

I have also examined many of the comments by broadcasters and broadcast trade groups that are opposed to the LPAM service because of a possible interference issue. They bring up things like loss of sky wave coverage to many stations, and other interference issues. They also refer to previous FCC rulemaking that has attempted to clean up the AM band and that the proposed LPAM service. All of this would have some validity if it weren't for the fact that many of these same groups are on record in docket 99-325 the so-called IBOC rulemaking. The proposed NRSC-5 digital standard for AM renders all the previous attempts to clean up the AM band moot. The interference caused by nighttime IBOC dwarfs anything that would come from a LPAM station. Their comments would be laughable if they weren't so serious. They seem to talk out of both sides of their mouths.
I do agree with many of them, that this proposal lacks some of the technical details. Hopefully, I may have added some food for thought, and I'm certainly not familiar with the original proposals intent, it appears they want guidance from the commission as to the technical details.

My feeling is that if TIS, HARV stations can exist on the AM band, then so can LPAM broadcasting.

I feel that the communications act of 1996 took away most localism in radio. Here in my city of Sarasota, FL. The most powerful AM station has recently been sold to a national company that moved the studios to Tampa, over 75 miles from the city of license. In order to say they have local presence, they have a small barely legal studio in an office building in St. Petersburg, FL., just barely within a

25 mile limit. Surely this station cannot nor will not serve its city of license with this arrangement. The two largest radio firms in the country own most of the other stations licensed to this market. Again, two of these are full class C FM's and have their studios in another ADI market. (Tampa) The rest are either non-comm. Religious stations, or small AM's with limited signals. (500 watts or less). So I feel strongly that in addition to the LPFM service, which has generated two stations in this market, a LPAM service is needed to serve the unmet needs of the community.

I feel any LPAM service should include the following:

1. NON COMMERCIAL operation only. I think the service should rely on local service and that can be underwritten by local business, not by advertising.
2. LOCAL OWNERSHIP. The owner can be an individual or corporation, but if a corporation, the members of the board of directors or private owner must live within a 25-mile radius of the transmitter.
3. LOCAL PROGRAMMING The LPAM station must be locally programmed. No more than 20% of total weekly programming can originate from outside the local area with exception of current newscasts and weather. No tricks like recording off satellite to a hard drive to rebroadcast seconds later should be allowed.
4. RADIO FORMATS The LPAM service needs to see as diverse group as possible and there should be only a maximum of 25% programming of religious programming. There are already numerous religious outlets in the translator service, non Comm FM, LPFM services.
5. OUTPUT POWER to be allowed to a maximum of the equivalent of 100 watts to a ¼ wavelength vertical antenna with 120 radials. Non-Directional only. Also allow smaller or lesser antennas because many stations will not be able to afford a full ¼ wavelength vertical with 120 ¼ wavelength radials. In other words, structure the rules so that station strength is measured by field strength, rather than input power to the antenna. This could allow all kinds of antennas like dipoles, wire antennas, folded unipoles, what's called the Kinstar antenna. It would also allow for ground conductivity adjustments, so that the stations output power would be equivalent to the standard ¼ vertical over a standard ground plane.
6. NOT ELIGIBLE FOR TRANSLATORS. There should not be allowed any translators for LPAM stations, or synchronized transmitters in order to increase range.

Respectfully submitted by

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